

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
(Greenbelt Division)**

In re:

Scott A. Dutrow

*Debtor*

Case No.: 24-13112-MCR

Chapter 13

**OBJECTION TO CLAIM OF CAVALRY SPV I, LLC**  
**(CLAIM NO. 15)**

Scott A. Dutrow (the “Debtor”), by undersigned counsel and pursuant to 11 U.S.C. § 502(b)(1) and F.R.B.P. 3001 and 3007, objects to claim 15 of Cavalry SPV I, LLC (“Cavalry”) for the reasons stated herein, as well as for any reasons to be stated at a subsequent hearing on this matter. In support of his Objection, the Debtor states:

**JURISDICTION**

1. Jurisdiction is appropriate in this Court pursuant to 28 U.S.C. § 1334 and 11 U.S.C. § 502. Venue is appropriate in this Court pursuant to 28 U.S.C. § 1409.
2. This is a core proceeding with the meaning of 28 U.S.C. § 157 (b)(2)(B) & (O).
3. On April 13, 2024 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
4. On June 18, 2024, Cavalry filed a proof of claim in this case (the “Claim,” a copy of which is attached hereto as **Exhibit 1**). In its Claim, Cavalry alleges a secured claim for \$809.50. *Exh. 1* at p. 2.
5. The basis of Cavalry’s security is a judgment entered in the District Court of Maryland for Frederick County.

**OBJECTION TO CLAIM AND REQUEST FOR RELIEF**

Md. Rule 3-621 provides that a District Court judgment only constitutes a lien on real property if a Notice of Lien is filed that is then transmitted to the Circuit Court. Cavalry has made no such demonstration, and therefore its claim should be classified as general unsecured.

**PURSUANT TO LOCAL BANKRUPTCY RULE 3007-1, YOU ARE HEREBY ADVISED THAT (A) WITHIN THIRTY (30) DAYS AFTER THE DATE ON THE CERTIFICATE OF SERVICE OF THE OBJECTION, THE CLAIMANT MAY FILE AND SERVE A MEMORANDUM IN OPPOSITION, TOGETHER WITH ANY DOCUMENTS AND OTHER EVIDENCE THE CLAIMANT WISHES TO ATTACH IN SUPPORT OF ITS CLAIM, UNLESS THE CLAIMANT WISHES TO RELY SOLELY UPON THE PROOF OF CLAIM; AND (B) AN INTERESTED PARTY MAY REQUEST A HEARING THAT WILL BE HELD AT THE COURT'S DISCRETION.**

WHEREFORE, Scott A. Dutrow, Debtor respectfully requests that this Court enter an Order:

- (i) Sustaining this Objection;
- (ii) Disallowing the secured portion of Cavalry's Claim; and
- (iii) Granting such other and further relief as is just and proper.

Respectfully submitted,

/s/ Eric S. Steiner  
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Federal Bar No. 28705  
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P.O. Box 17598, PMB 83805  
Baltimore, MD 21297  
(410) 670-7060 (phone)  
(410) 834-1743 (fax)

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 3<sup>rd</sup> day of July, 2024, a true and correct copy of the foregoing was served via the Court's CM/ECF system to:

Rebecca A. Herr  
Chapter 13 Trustee

I FURTHER CERTIFY that on this 3<sup>rd</sup> day of July, 2024, a true and correct copy of the foregoing was sent via first class mail, postage prepaid, to:

Cavalry SPV I, LLC  
P.O. Box 4252  
Greenwich, CT. 06831

Cavalry SPV I, LLC  
c/o Caitlin Truman  
P.O. Box 4252  
Greenwich, CT. 06831

Cavalry SPV I, LLC  
c/o The Corporation Trust, Inc,  
2405 York Road, Suite 201  
Lutherville, Timonium, MD 21093-2264

/s/ Eric S. Steiner  
Eric S. Steiner